**Shaklee Corporation** 

Hacienda Campus 4747 Willow Road Pleasanton, CA 94588-2740 Telephone 925/924-2586 Fax 925/924-2155 Marjorie L. Fine Senior Vice President and General Counsel

SEP 2 4 2001

71924

September 18, 2001

Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 C Street, S.W.
Washington, D.C. 20204

Re: Section 403(r)(6) Notification

Dear Sir or Madam:

In accordance with the requirements of section 403(r)(6) of the Federal Food, Drug and Cosmetic Act, Shaklee Corporation hereby notifies FDA that it has begun using the following statements:

Clinically proven to super enhance bioavailability using all natural ingredients; one capsule meets your body's daily usage.

 $CoQ_{10}$  is vital for the health of your heart. It helps prevent LDL cholesterol oxidation. It promotes energy production in every one of your cells. Especially in your heart and major organs. Shaklee CoQHeart meets your body's daily usage with just one simple, highly bioavailable capsule.

 $CoQ_{10}$  is vital for heart health. It helps produce energy in each of your cells. Particularly in your heart and major organs. It also helps prevent LDL cholesterol oxidation. Shaklee CoQHeart meets your body's daily usage with one simple, highly bioavailable 30 mg capsule.

Resveratrol is believed to be one of the key beneficial compounds found in red wine. Its strong antioxidant properties help prevent LDL cholesterol oxidation. It may also help facilitate blood flow.

Resveratrol's strong antioxidant properties may help prevent LDL cholesterol oxidation and facilitate blood flow.

Coenzyme  $Q_{10}$  is vital for heart health. It helps produce energy in every one of your cells. That's especially important to your heart and major organs. Beyond that,  $CoQ_{10}$  also helps prevent LDL cholesterol oxidation.

975 0162 LET 8615

Food and Drug Administration September 18, 2001 Page 2

Resveratrol is believed to be one of the most beneficial compounds found in red wine. It has strong antioxidant properties and complements  $CoQ_{10}$  in the prevention of LDL cholesterol oxidation. Even more, Resveratrol might help facilitate blood flow and may help prevent LDL cholesterol oxidation.

Due to its high bioavailability, CoQHeart meets your body's daily usage with one simple capsule.

Coenzyme  $Q_{10}$  (Co $Q_{10}$ ) helps produce energy in each cell, particularly those in the heart and other major organs. Since it has powerful antioxidant properties, it helps prevent LDL cholesterol oxidation.

Combines the power of CoQ<sub>10</sub> with Resveratrol to promote heart health.

Prevents the oxidation of LDL cholesterol.

Provides energy at the cellular level.

Helps keep blood flowing freely through the arteries.

CoQHeart is the only product that combines Coenzyme Q<sub>10</sub> with Resveratrol, which contains strong antioxidant properties proven to help prevent LDL oxidation and facilitate blood flow.

which contain the statutory statement, on the following product:

CoQHeart™ Dietary Supplement

I certify that the foregoing is complete and accurate, and that Shaklee Corporation has substantiation that the statements are truthful and not misleading.

Very truly yours,

Marjórie L. Fine

MLF/ams